

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**DAVID FLOYD, et al.,**

**08 Civ. 01034 (SAS)**

**Plaintiffs,**

**-against-**

**THE CITY OF NEW YORK, et al.,**

**REPLY DECLARATION OF  
DEON DENNIS**

**Defendants.**

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DEON DENNIS declares as follows pursuant to 28 U.S.C. § 1746:

1. I am a named plaintiff in the above-captioned case. I submit this declaration in further support of Plaintiffs' motion for class certification.
2. As I stated in my prior declaration of November 4, 2011, while I have lived in Sumter, South Carolina since October of 2008, I still have many close friends and family members living in New York City whom I have visited and plan to continue to visit regularly.
3. In my current job at the Pilgrim poultry processing plant in Sumter, South Carolina, where I have worked since May 2009, I am permitted to take two weeks of vacation each year.
4. I have taken two separate one-week vacations in 2011. I took the first in June 2011, and I spent it visiting my family and friends in New York City.
5. As of the date of this declaration, I am currently in the middle of my second vacation of the year, which I am again spending with my family and friends in New York City.
6. I will be traveling to New York City again for a weekend in March 2012 to attend

a birthday party for my uncle, and I plan to spend my vacation time in 2012 visiting my family and friends in New York City.

I declare under penalty of perjury this 29<sup>th</sup> day of December, 2011 that the foregoing is true and correct.

  
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DEON DENNIS